

**State of Indiana
State Plan for the Operation and Administration
of the
Commodity Supplemental Food Program
Fiscal Year 2005**

ADMINISTRATIVE SUMMARY

The State Plan of Operation sets forth the procedures utilized in the administration of the Commodity Supplemental Food Program for Federal Fiscal Years 2005-2008.

The United States Department of Agriculture (USDA) administers the Commodity Supplemental Food Program (CSFP) to a targeted group of women during pregnancy and the year postpartum, children up to six years of age, and the elderly who are more than 60 years of age. Targeted groups must meet income eligibility guidelines.

The Indiana Family and Social Services Administration (FSSA), Division of Family and Children (DFC), Housing and Community Services Section (HCSS) will act as the distribution agency. Many program area fall under the umbrella of FSSA such as the Division of Disability, Aging and Rehabilitative Services and the Division of Mental Health and Addiction. However, HCSS has a successful history as the state agency responsible for administering several programs. The following is a listing of some of these programs:

- TEFAP
- CSFP
- Consolidated Outreach Program (Migrant Program)
- Community Food and Nutrition Program
- Weatherization Program
- Energy Assistance Program (Utility Assistance)
- Section 8 Housing
- Domestic Violence
- Emergency Shelter Assistance
- Community Services Block Grant
- Family Development
- Healthy Families
- Child Care Programs
- Child Welfare
- Child Support
- Child Development

**INDIANA-CSFP
STATE PLAN 2005**

- Food Stamps
- IMPACT
- Medicaid
- Hoosier Healthwise
- Hoosier RX
- TANF
- Family Protection
- Family Independence

A. LOCAL AGENCY IDENTIFICATION

Gleaners Food Bank of Indiana, Inc. is the designated local agency for participation in CSFP. Gleaners, located at 1102 E. 16th Street., Indianapolis, IN 46202, is a private, not-for-profit organization dedicated to alleviating hunger, and operates a variety of programs to help agencies serve the needy. Gleaners is a member of America's Second Harvest. In addition to distributing donations from food manufacturers and local food drives, Gleaners administers The Emergency Food Assistance Program (TEFAP) for 11 Indiana counties and is the State of Indiana's receiving, storage and transportation vendor for the statewide TEFAP.

1. Local CSFP Distribution

Gleaners currently serves one urban county and four rural counties – Marion, Crawford, Knox, Orange, and Vermillion respectively. When Indiana receives authorization for an expanded caseload, there are two options for additional local distribution agencies. One, Gleaners would subcontract with other local agencies or other agencies would be a separate entity with full responsibility for future distributions in the additional counties.

One of the key components is the use of existing services. This includes a network of agencies in all counties in Indiana that are engaged in TEFAP delivery service, experienced intake workers, and a history of working cooperatively with other agencies. These strengths and areas of expertise, coupled with Gleaners' ability to manage food distribution programs, allowed Indiana to establish a model for CSFP in Indiana.

2. Food Distribution and Storage Sites

Gleaners serves as the central storage and distribution facility for CSFP commodities in the existing counties. Gleaners is the only high-volume charitable food distribution center in central Indiana that handles in excess of 15 million pounds of product per year. A staff of 40, augmented by approximately 400 volunteers each month, operates Gleaners' 83,000 square-foot warehouse, 80,000 cubic feet of freezer space and 70,000 cubic feet of refrigeration. Gleaners also serve as a regional distribution hub for America's Second Harvest for the surrounding food banks and the entity that handles storage and transportation of TEFAP commodities to ten distributing recipient agencies throughout Indiana.

B. CERTIFICATION

Eligibility for participation in CSFP is based upon an individual's categorical status and household income. In accordance with USDA regulations (7 CFR Part 247), the state agency has developed a list of criteria for certification to be used by the local agency and any potential subcontractors, or another agency that HCSS may contract with directly. Certification for Indiana participation requires categorical eligibility as elderly, at least sixty years of age.

1. Income Criteria

The income criteria used to determine CSFP program eligibility is participation in or income eligibility for local benefits under existing federal, state, or local food, health or welfare programs for low-income persons. The state agency has determined that the highest income standard for this program is 130% of the poverty income guideline established by the United States Department of Health and Human Services.

Each intake worker is trained and certified on the rules and regulations of CSFP prior to interviewing and completing an application. Gleaners staff determines eligibility for potential participants. This serves as a strong direct service component. All certification data is recorded on a certification form. Certification information includes:

- Applicant's name, address, phone number,
- Name and address of any proxy authorized to receive food on the participant's behalf,
- Date of the initial interview to apply for CSFP participation,
- Date of certification,
- Applicant's certification that he/she is eligible for CSFP,
- Signature and title of the person making the eligibility determination,
- If applicant is a food stamp participant.

The completed application is forwarded to the local agency for certification and entry into the computer database and then maintained by site location. The client is given a copy of rules, their responsibilities, and the civil rights information at time of enrollment. Upon approval of eligibility, participants receive an identification card that is provided for comparison to the signature sheet for receipt of food each month. Participants also receive a six-month list for place, times, and dates of package pick-up.

2. Participant's Civil Rights

Participants are given a copy of their Rights and Responsibility on the initial visit. This copy is read to the applicant or the caretaker at the time of certification. When a significant portion of the population served by a local agency is composed of non-English or limited English speaking persons, who speak the same language, the sentences shall be stated to each person in a language they understand.

This information also includes rules governing fraud, misrepresentation, and subsequent ineligibility should a participant willfully give false information. Requirements outlined in 7 CFR 247.5(a) (14) and Guidance procedures will be followed per all regulations.

a. Posters

Civil Rights posters, Justice for All posters and any other appropriate posters or information will be displayed in all areas of any facility frequented by participants and applicants.

b. Training

Civil Rights training will be conducted with the intake training sessions and during TEFAP local agency trainings.

3. Household Income, Age, and Residency Criteria for 60-year plus:

- a. Sixty years of age or older.
- b. Self-declaration at 130% or below, with signature.
- c. Age verification with driver's license, state identification card, or another formal documentation, verifying age. If a birth certificate is not available, church, school, or medical records are acceptable.
- d. Residency is established by presenting recent utility bills, driver's license, state identification card, or another proof of county residency.
- e. Recertification will be done every six months, until each county reaches caseload capacity with a waiting list.
- f. Indiana is considering revising a recertification form.

4. Residency Requirement

Eligibility requires a determination of the residency of the applicant within the service area designated by HCSS. Recent utility bills, driver's license, state identification card, or other proof of residency will be used as proof of residency. Migrant and seasonal farm workers entering a CSFP service area will be considered to meet the residency requirement immediately upon meeting all other eligibility criteria.

5. Waiting List Procedures

Certified intake workers at each of the distribution sites will have a maximum caseload, based on the number of slots funded for the program year. When maximum caseload is reached, the local agency will establish a waiting list from applications provided by intake workers. Intake workers will continue to accept applications, but will personally inform applicants that their names are being placed on a waiting list. Applicants will be notified as soon as there is an opening at a particular site, based on date of application, and approval by the local agency.

6. Notification of Fair Hearing

At the time of certification and recertification, applicants are informed that they have a right to a fair hearing and that they may appeal any decision made by the local agency regarding denial or termination from the program.

Additionally, applicants are informed of the following:

- The standards for participation in the program are the same for everyone regardless of race, creed, color, sex, sexual preference, or national origin;

- That nutrition education is provided to all participants; and
- How the food delivery system is operated by the site serving them.

7. Certification Periods

Eligible recipients are certified at the time of their entrance into CSFP and every six months thereafter. The local agency assures that site personnel will accomplish this requirement on a timely basis to avoid an interruption of CSFP benefits to participants, while they perform recertification. Participants are notified one month in advance of impending expiration of their certification and advised of the information they will need to bring the next month to be recertified.

C. CASELOAD MANAGEMENT AND REQUEST

1. Caseload Assignment

Initial caseload assignment is designated by USDA/Food and Nutrition Service (FNS) based on formula established in 7 CFR 247. HCSS is requesting an additional 5,000 slots for clients to be served through CSFP for FFY 2005.

2. Caseload Expansion

Requests for additional caseloads for CSFP are made the yearly. In accordance with federal regulations, any requests for additional caseload slots would involve identifying the number of new slots being requested, the primary category of participants, and the geographic area to be served.

3. Maximum Caseload

HCSS's caseload is monitored on a monthly basis. The local agency, with assistance of its large pool of volunteers, actively seeks to follow-up with clients who fail to pick up commodities each month. Participants are reminded on a monthly basis of CSFP nutritional value, and are asked if any problems impede them from CSFP participation.

D. NUTRITION EDUCATION

The goal of the nutrition education program is to enable CSFP participants to obtain better nutritional status through increased understanding of basic nutrition

principals and through effective use of food products. The following are essential to achieving that goal:

- Reinforcement of basic nutrition instruction;
- Instruction on the use of commodity supplemental foods, including food preparation techniques, recipes, meal frequency, and food cost savings;
- Recognition of the special health and nutritional problems of low-income individuals, such as high blood pressure, sodium/potassium ratios, anemia and obesity;
- Dissemination of information on preventative health care and nutrition will be accomplished through partnerships with county community programs such as Purdue University Nutrition Services, Cooperative Extension Services and TEFAP trainings;
- Consumer resource information and assistance; and
- Motivational messages on topics such as health care, good grooming, and mental health.

1. Program Components

One of the key components is the use of existing facilities and services. Gleaners and potential subcontracting agencies are very experienced in client intake. Volunteers and staff will be trained to promote CSFP to potential clients.

With the Purdue University School of Nutrition and the Expanded Food and Nutrition Education Program (EFNEP), HCSS can assist in developing a nutrition education program to be administered at local distribution sites. This can include nutrition information, recipes, discussion guides, suggested menus, etc. HCSS in conjunction with the Community Food and Nutrition Grants assists Purdue University in the writing, publishing, and mailing of a quarterly newsletter, "Safe Food". Many of the articles in the quarterly newsletter can be included in the monthly "Share a Sack" newsletter that can be given to all the CSFP participants. EFNEP staff has presented information at agency workshops on nutrition, use of commodities and cooking classes. CSFP is an excellent referral for EFNEP's in-home cooking classes. A survey will be conducted each year asking participants what information has been helpful and for suggestions for improvement.

2. Outreach

Intake workers from local agencies encourage potential WIC and food stamp eligible clients to apply for these programs. Posters and flyers outlining CSFP will be made available to health care clinics, food stamp centers, churches, food pantries, and soup kitchens for maintaining a waiting list of eligible recipients. Gleaners has an established rapport with the local media and has developed public service announcements for newspapers, radio and television stations.

E. FOOD DELIVERY SYSTEM

1. Methods of Transportation

CSFP commodities are shipped directly to the local agency monthly. The local agency, utilizing the food bank trucks, assembles and delivers commodities to the distribution sites. Commodities, individually boxed for each participant, are kept in secure storage at distribution sites until received by the participant. If recipients are unable to attend a distribution, arrangements can be made for an alternate to pick up their products, or for home delivery.

2. Method Food Distribution

The local distribution site manager is responsible for the receipt of the food boxes until given to the CSFP participant. Food orders, once completed, are shipped with signatures sheets, recertification forms, and any other pertinent information for the monthly distribution. Signed invoices will document distribution of product from the local agency to each site. Each site is required to do a physical inventory each month and reconcile it with actual distribution figures. Inventory reports will be returned to the local agency within seven days of the distribution.

The local agency will keep an on-going inventory of all product received and distributed. A computerized inventory control program tracks product. Physical inventories will be taken monthly. Inventory reports will be submitted monthly to HCSS and will provide information detailing product on hand, received, distributed and remaining amounts. The same state-approved procedures for reporting damage and/or loss that are used for TEFAP will be used for CSFP.

Food packages will be distributed on a monthly basis. Participants will be required to present their I.D. card at the distribution site. The actual style of a distribution will depend on the number CSFP participant assigned to a distribution site.

3. Style of Food Distribution

Depending upon the location of distribution sites and space allowable, the following methods may be used:

- Prepackaged and picked up by participants;
- Home delivered or picked up with proxy statement ;
- Self serve from mobile pantry;
- Drive thru;
- Self serve from the distribution site; and
- Tail gate

4. Commodity Liability

When physical delivery of commodities is taken, the distribution site assumes responsibility for the safekeeping of the product. The distribution site also assumes liability for the value of the commodities, should a loss occur due to negligence in storage, theft, fire, other losses, and/or handling. Although USDA provides commodities without cost, there is a value assigned to each product that includes USDA's cost of purchasing, processing, and distribution of commodities to participating states. In order to guarantee its quality and safety, each distribution site is responsible for the proper storage and handling of USDA commodities.

5. Improper Distribution

HCSS staff will perform a warehouse inventory review and complete physical inventory reconciliations each year. Any agencies under contract with HCSS are required to pay for product damage and/or loss (at the current value as established by the USDA) due to negligence on their part. Occurrences of improper distribution will be tracked, corrective action is required, and local agencies will be monitored to document compliance. Non-compliance and/or repeated incidents of improper distribution may jeopardize continuous participation in the program.

6. Damaged and Out-of-Condition Commodities

Product found to be out-of-condition is handled according to federal guidelines in FNS Instruction 710-1.

Out-of-condition product are those commodities, which appear to have come from the packer, contaminated and/or in receipt of the distribution site, that are or become deteriorated, spoiled, infested, or having latent defects. All commodities must be inspected upon receipt. Bulging cans or cans with sharp dents and rust on the seams are examples of out of condition products. Should foreign matter such as glass or metal be found in a product, the situation should be treated as an emergency; HCSS staff should be called immediately for procedures.

Local and/or other participating agencies will be instructed to refer all programs, product and delivery complaints regarding CSFP commodities to HCSS staff for processing.

7. Re-donation

Federal guidelines will be adhered to in establishing a re-donation policy.

8. Warehouse Review

As required by federal regulation, HCSS will monitor local agency warehouse facilities on an annual basis. HCSS and/or local agencies will monitor local distribution sites.

F. MANAGEMENT EVALUATION AND REVIEW

The monitoring of the CSFP will be conducted by the state agency and USDA/FNS. HCSS, in cooperation with FNS, will monitor all aspects of the CSFP on an annual basis. HCSS will monitor the food inventories by the submission of shipping notices, documentation of the monthly inventories, and by on-site reviews of the physical inventory on a yearly basis. The local agency will be notified of recommended and required corrective action and will be required to submit a corrective action plan to the state agency within thirty days.

When additional participating agencies become part of this program they will receive a copy of federal and state program regulations and policy mandates. Required quarterly meetings will be held in Indianapolis to discuss and review the program operations. HCSS will conduct workshops and training sessions to advise and instruct local agencies on program regulations and requirements.

G. STATE PLANNING

The HCSS State Plan has been a combined effort of interested state and local participant.

H. FINANCIAL MANAGEMENT

With regard to disbursement of funds and the allowance of various kinds of expenditures for federally funded programs, the state and local agency will administer the program in accordance with the requirements of FMC 74-4, OMB Circulars A-102 and A-110, where applicable. HCSS shall operate as a pass through system for the CSFP distribution of funds to the local agency. Administrative funding will also be shared between HCSS and the local agency, as available.

Specific charges against the program at the state level will fall into several cost categories determined by the financial management office. Travel costs are controlled by state travel requirements. Supplies, materials, and equipment are ordered on requisitions authorized by the Section Manager.

Local level administrative and distribution costs are to be reimbursed by the state, keeping within the local agency authorized funding level and the state/local contract agreement. Payments to the local agency for allowable costs are based on caseload rate for reimbursement. Claims for reimbursement are submitted by the local agency monthly. Requests are then reviewed and approved for payment by the CSFP state coordinator and the Section Manager. Approved requests are then

forwarded to fiscal operations for payment within 25 to 30 days. Drawdowns against program funding will be made based on the total amount of approved requests on a monthly basis. CSFP state office shall maintain account ledgers, implementing computer spreadsheets, to reflect reimbursements to local agencies and balance of funds on hand. Program funding shall be budgeted on a quarterly basis for local agency reimbursement. Specific procedures for reimbursements will be determined on caseload size and funding. Costs claimed by local agency are governed by state accounting guidelines and requirements and applicable OMB Circulars. Costs are subject to on-site verification through periodic site visits and management evaluation and audit process.

All records shall be maintained for a period of three years from the close of the fiscal year to which they pertain, or until all open audits or investigations are closed and permission to destroy is received. All records, except medical case records of participants (unless they are the only source of certification data) shall be available during normal business hours for representatives of the state, USDA and General Accounting Office to inspect, audit and copy.

1. Financial Reports

- a. FNS-153 is the Monthly Report of the Commodity Supplemental Food Program and Quarterly Administrative Status Report. Indiana will report the cumulative amount of administrative funds expended and obligated, and the amount remaining unobligated on a quarterly basis, utilizing the FNS-153. Indiana will also use this form to report participation and commodity distribution data on a monthly basis.

- b. SF-269A- Financial Status Report

Indiana will submit the SF-269A to report the financial status of the program at the close of the fiscal year. The report will be submitted within 90 days after the end of the fiscal year.

I. COMPLAINTS

The local agency refers complaints about the program reporting, processing, and supplemental foods to HCSS for referral to USDA.

J. AUDITS

Audits of the program shall be conducted in accordance with 7 CFR 247.15. Gleaners Food Bank is audited on an annual basis by an independent auditing firm. Reports of the most current audits are available on request.

K. CIVIL RIGHTS

The program is open to all eligible persons in accordance with Federal law and USDA policy, this institution is prohibited from discriminating on the basis regardless of race, color, national origin, sex, age, disability. who meet the program eligibility requirements as outlined in this document. CSFP materials contain an equal opportunity statement that directs anyone who believes that discrimination has occurred to file a complaint with the Secretary of Agriculture in Washington, D.C. Local agency collects, at the request of the State and USDA, racial and ethnic data at the time of certification and recertification by observation and inquiry. A report of racial and ethnic participation is submitted semi-annually to the state and is forwarded to the USDA Food and Nutrition Service.

In conjunction with its annual management evaluation, HCSS conducts a civil rights review of the local agency. In accordance with FNS Instruction 113-2, any instances of non-compliance are noted and appropriate action is taken.

L. FAIR HEARINGS

A right to an appeal and a fair hearing is provided to those applicants who contest a denial of certification or who have areas of concern regarding CSFP. An appeal can be made orally or in writing at the local distribution site, or at Gleaners Food Bank. A panel consisting of representatives from FSSA, Gleaners and local distribution sites shall conduct an appeal review.

M. DOCUMENTATION OF NEED

Need in the five selected counties is best indicated through review of poverty statistics from the U.S. Census Bureau:

<u>County</u>	<u>Total Population</u>	<u>Poverty Population</u>	<u>FS Usage All Ages</u>	<u>Caseload</u>
Crawford	10,743	9.5%	887	210
Knox	39,256	9.5%	1,858	560
Marion	860,454	11.9%	51,910	3,685
Orange	19,306	9.5%	662	345
Vermillion	16,579	9.5%	319	200

M. SITE LISTING FOR DISTRIBUTION OF CSFP FOOD BOXES